

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS, LLC,

Debtor.

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) (Chapter 11) Subchapter V
)
) Case No. 22-60043 (CML)
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)
)
)

**STIPULATION AND AGREED ORDER EXTENDING
THE DEADLINE TO OBJECT TO DISCHARGEABILITY**

The above-captioned debtor and debtor-in-possession (the “Debtor”), Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (the “Texas Plaintiffs”), David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach and Robert Parker (the “Connecticut Plaintiffs” and, together with the Texas Plaintiffs, the “Sandy Hook Families”) and the official committee of unsecured creditors in the chapter 11 case of Alexander E. Jones (together with the Debtor and the Sandy Hook Families, the “Parties”) hereby enter into this stipulation and agreed order (“Stipulation”) as follows:

WHEREAS, on July 29, 2022 (the “Petition Date”), the Debtor filed a voluntary petition for relief under subchapter V of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas (the “Court”);

WHEREAS, on August 12, 2022, the Court entered the *Subchapter V Deadlines Order* [ECF No. 65], setting the deadline for the Debtor to file a plan of reorganization (the “Plan”) for October 27, 2022;

WHEREAS, on October 21, 2022, the Debtor filed its *Emergency Motion for Extension of Time to File a Plan of Reorganization* [ECF No. 246], requesting an extension to file its Plan;

WHEREAS, on October 25, 2022, the Court entered the *Order Granting Motion for Extension of Time to File a Plan of Reorganization* [ECF No. 254], which extended the deadline for the Debtor to file its Plan until December 16, 2022;

WHEREAS, on October 28, 2022, the Court entered the *Stipulation and Agreed Order* [ECF No. 260] extending the deadline to object to dischargeability pursuant to any potentially applicable law, including, but not limited to Bankruptcy Code section 523(c), to January 5, 2023;

WHEREAS, on December 6, 2022, the Debtor filed its *Second Emergency Motion for Extension of Time to File a Plan of Reorganization* [ECF No. 299], requesting an extension of time to file its Plan;

WHEREAS, on December 19, 2022, the Court entered the *Order Granting Second Motion for Extension of Time to File a Plan of Reorganization* [ECF No. 332], which extended the deadline for the Debtor to file its Plan until February 17, 2022; and

WHEREAS, the Parties have agreed to a corresponding extension of the deadline to object to dischargeability pursuant to any potentially applicable law, including, but not limited to Bankruptcy Code section 523(c), and without agreeing to the applicability of same. The Parties expressly reserve their rights regarding same.

NOW, THEREFORE, IT IS STIPULATED BY THE PARTIES AND, UPON APPROVAL BY THE BANKRUPTCY COURT, ORDERED THAT:

1. The deadline to object to dischargeability pursuant to Bankruptcy Code section 523(c) and any other potentially applicable law is extended to March 10, 2023.

Dated: _____

THE HONORABLE CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE

AGREED IN FORM AND SUBSTANCE:

Free Speech Systems, LLC

By: /s/ Raymond W. Battaglia

Raymond W. Battaglia

Law Offices of Ray Battaglia, PLLC

Counsel to the Debtor

The Texas Plaintiffs

By: /s/ Avi Moshenberg

Avi Moshenberg

McDowell Hetherington LLP

Counsel to the Texas Plaintiffs

-and-

Jarrod B. Martin

Chamberlain, Hrdlicka, White,

Williams & Aughtry, PC

Bankruptcy Counsel to the Texas Plaintiffs

**The Official Committee of Unsecured
Creditors of Alexander E. Jones**

By: /s/ David M. Zensky

David M. Zensky

Akin Gump Strauss Hauer & Feld LLP

Proposed Counsel to the Official Committee of

Unsecured Creditors of Alexander E. Jones

The Connecticut Plaintiffs

By: /s/ Alinor C. Sterling

Alinor C. Sterling

Koskoff Koskoff & Bieder PC

Counsel to the Connecticut Plaintiffs

-and-

Ryan E. Chapple

Cain & Skarnulis PLLC

*Bankruptcy Co-Counsel to the Connecticut
Plaintiffs*

-and-

Kyle J. Kimpler

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LLP

*Bankruptcy Co-Counsel to the Connecticut
Plaintiffs*